

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Katrina M. Lewis		
	Debtor	CHAPTER 13
PNC BANK NATIONAL ASSOCIATION		
	Movant	
vs.		
Katrina M. Lewis		NO. 19-14535 AMC
	Debtor	
William C. Miller Esq.		
	Trustee	11 U.S.C. Section 362

**MOTION OF PNC BANK NATIONAL ASSOCIATION
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is PNC BANK NATIONAL ASSOCIATION.
2. Debtor is the owner of the premises 311 Cobbs Creek Parkway, Philadelphia, PA 19143, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$75,605.00 on the mortgaged premises that was executed on June 8, 2015. Said mortgage was recorded on June 17, 2015 at Document No. 52929188 in Philadelphia County. Documentation attached hereto as Exhibit A is provided in support of right to seek a lift of stay and foreclose if necessary.
4. William C. Miller Esq., is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor.
6. Debtor has failed to make the monthly post-petition mortgage payments in the amount of \$601.82 for the months of September 2019 through November 2019.
7. The total amount necessary to reinstate the loan post-petition, less suspense balance of \$21.52 is \$1,783.94.
8. Movant is entitled to relief from the automatic stay for cause pursuant to 11 U.S.C. § 362(d).

9. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/Kevin G. McDonald, Esquire

Kevin G. McDonald, Esquire

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadelphia, PA 19106-1532

Phone: (215) 627-1322 Fax: (215) 627-7734

Attorneys for Movant/Applicant